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9 Attorneys for Keith Williams

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 * * *

13 UNITED STATES OF AMERICA,

14 Plaintiff,

vs.

15 KEITH WILLIAMS,

16 Defendant.

17 CASE NO.: 2:14-mj-498-03-PAL

18 **DEFENDANT'S UNOPPOSED MOTION TO CONDUCT A PRE-PLEA**
PRESENTENCE INVESTIGATION REPORT AND PROPOSED ORDER

19 COMES NOW Defendant, KEITH WILLIAMS, by and through his counsel of record,
20 THOMAS A. ERICSSON, ESQ., and hereby submits this Defendant's Unopposed Motion to
21 Conduct a Pre-Plea Presentence Investigation Report and Proposed Order.

22 Dated this 17th day of September, 2014.

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29 */s/ Thomas A. Ericsson*
30 THOMAS A. ERICSSON, ESQ.
31 700 South Third Street
32 Las Vegas, Nevada 89101
33 Attorneys for Keith Williams

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STATEMENT OF FACTS

On July 29, 2014, the Government charged Mr. Keith Williams with one count of Conspiracy to Interfere with Commerce by Robbery, one count of Brandishing a Firearm in Furtherance of a Crime of Violence, and one count of Interference with Commerce by Robbery. The preliminary hearing is currently set for October 6, 2014.

The defense has received the discovery on this matter. Given the fact that Mr. Williams might face sentencing enhancements, the parties have agreed to request a pre-plea PSI for Mr. Williams. Additionally, the parties request that the Court order its preparation.

Dated this 17th day of September, 2014.

/s/ Thomas A. Ericsson
THOMAS A. ERICSSON, ESQ.
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UNITED STATES DISTRICT COURT
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10 Plaintiff,

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ORDER

IT IS HEREBY ORDERED that the Department of Parole and Probation prepare a pre-plea presentence investigation report for Defendant Keith Williams.

Dated this 23rd day of September, 2014.


United States Magistrate Judge

ORONOZ & ERICSSON
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700 South Third Street • Las Vegas, Nevada 89101
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of ORONOZ & ERICSSON and on this 17th day of September, 2014, I did serve a true and correct copy of the foregoing DEFENDANT'S UNOPPOSED MOTION TO CONDUCT A PRE-PLEA PRESENTENCE INVESTIGATION REPORT AND PROPOSED ORDER by U.S. District Court CM/EMF Electronic Filing, to:

Daniel G. Bogden
United States Attorney
Sarah E. Griswold
Assistant United States Attorney
330 Las Vegas Blvd. South
5th Floor
Las Vegas, Nevada 89101

and

All other parties and counsel included in the CM/EMF filing list

By: /s/ Rachael Stewart
An employee of Oronoz & Ericsson LLC